

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Justin D. Koble, being duly sworn, do hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS’s Columbus, Ohio field office. In this capacity, I am responsible for investigating the use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of Title 18, United States Code, Sections 1956 and 1957 (money laundering).
2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants that have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center (“P&DC”) involves investigating the use of the U.S. Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.
3. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport illegal drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.
4. This Affidavit is made in support of an Application for a search warrant for the following property: a **United States Postal Service (USPS) Priority Mail parcel bearing USPS Tracking Number 9505 5163 2821 2228 5813 42**, (hereinafter, the SUBJECT PARCEL). This Affidavit is made in support of an Application for a warrant to search the SUBJECT PARCEL for, and seize from the SUBJECT PARCEL, evidence of a crime, as well as contraband, fruits of

a crime, or other items illegally possessed in relation to the following offenses:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code Section 841;
- b. Use of a Communication Facility, in violation of Title 21, United States Code Section 843(b); and
- c. Conspiracy to Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code Section 846.

5. The facts set forth in this Affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this Affidavit is submitted for the limited purpose of establishing probable cause in support of the Application for a search warrant, this Affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

6. On or about August 17, 2022, USPIS interdiction personnel interdicted the SUBJECT PARCEL. The SUBJECT PARCEL is addressed to “Beth Jone, 4500 Keeler Dr, cols, OH 43227,” with a return address of “Mary Jone, 1219 E. Maple Ave, El Segundo, CA 90245.” The SUBJECT PARCEL is a USPS Priority Mail large flat-rate mailing box measuring approximately 12 ¼” x 12” x 6” and weighing approximately 11 pounds 6.4 ounces. The SUBJECT PARCEL was mailed from the USPS El Segundo Branch Post Office, 2130 E Mariposa Avenue, El Segundo, California 90245 on or about August 16, 2022. The \$21.50 in postage affixed to the SUBJECT PARCEL was paid for in cash.



PROBABLE CAUSE

7. Your Affiant has become aware through experience and training that drug traffickers frequently use Priority Mail Express and/or Priority Mail services offered by the USPS, to transport narcotics and other dangerous controlled substances as well as drug proceeds. These services charge a higher fee because they are very timely, reliable, and trackable. However, due to the higher fee, these services are not typically used for personal mailings but rather are utilized by commercial mailers and business customers. As they are mostly used for commercial services, they are typically paid for using electronic postage or credit card as opposed to being paid for in cash. Because these services are reliable and trackable, they are often favored by persons who transport contraband and/or illegal controlled substances and drug proceeds. When used for illegal activity, these services are frequently paid for in cash. In my experience and through training, drug traffickers pay for these services in cash so that the transaction cannot be traced to a particular credit card or business account, and because drug trafficking is often a cash business.

8. Also relevant here is the additional characteristic possessed by the SUBJECT PARCEL—namely, the “source state” origination of the parcel. US Postal Inspectors, special agents of the Drug Enforcement Administration (DEA), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio.

9. On or about August 22, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, “1219 E. Maple Ave,” was determined to be a valid and deliverable address in the 90245 zip code however, the name “Mary Jone” was not found to be associated with the address.

10. Further, on or about August 22, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the delivery address information contained on the SUBJECT PARCEL. The receiving address, “4500 Keeler Dr” was found to be a valid and deliverable address in the 43227 zip code however, the name “Beth Jone” was not found to be associated with the address.

11. Based on my experience and training, I know that drug shippers will often list a legitimate return address with a fictitious name. This is done in an attempt to legitimize the shipment and avoid detection by law enforcement. A valid recipient’s address is necessary to permit the delivery of such parcels and a fictitious recipient name is frequently used for these same reasons.

12. Because the SUBJECT PARCEL was found to originate in a location known to be a source for controlled substances being mailed to Ohio, the postage was paid for in cash, and the return and destination names were determined to be fictitious, US Postal Inspectors subjected the SUBJECT PARCEL, among other parcels, to examination by a drug detecting canine.

EXAMINATION BY CERTIFIED DRUG CANINE

13. On or about August 23, 2022, U.S. Postal Inspectors contacted Trooper Jeff McNamara, Ohio State Highway Patrol, who is the handler for “Dale,” a drug detecting canine. “Dale” has been certified by the Ohio Peace Officers Training Association since June 2022, for article search, and the detection of Cocaine, Heroin, Methamphetamine, and their derivatives. Canine “Dale” has more than 200 hours of training at the Ohio Highway Patrol K9 Training Facility. Both in training and actual deployments, canine “Dale” has successfully detected narcotics; demonstrating clear, passive alerts and establishing himself as a highly reliable police service

dog.

14. The SUBJECT PARCEL was hidden among other parcels and mail processing equipment and Canine "Dale" was allowed to search the entire area. Trooper McNamara concluded that "Dale" did alert positively and independently to the SUBJECT PARCEL. Based on that alert, Trooper McNamara concluded that the odor of one of the drugs "Dale" is trained and certified to detect was present.

CONCLUSION

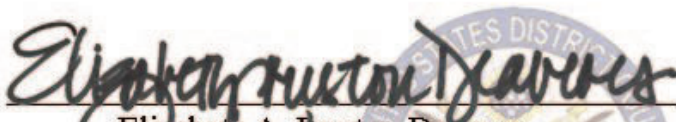
15. I know based on training and experience that information listed herein identifies common characteristics of United States Postal Service parcels that contain a controlled substance. Based upon my experience and training, this information, along with the parcel being mailed from a known drug source location is indicative of the parcel containing narcotics.

16. In addition, based upon the information contained in this Affidavit, your Affiant believes that there is probable cause to believe that the SUBJECT PARCEL described herein will contain evidence and/or contraband, fruits of crime, or other items illegally possessed.

WHEREFORE, your Affiant respectfully requests that the Court issue a warrant, authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, photograph, and seize, if necessary, the SUBJECT PARCEL and its contents.


Justin D. Koble
U.S. Postal Inspector

Sworn and subscribed to me this 25th day of August 2022


Elizabeth A. Preston Deavers
United States Magistrate Judge

